



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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**OCT 17 2011**

Ref: EPR-N

Ms. Pamela Murdock  
Bureau of Land Management  
Rawlins Field Office  
1300 North Third  
PO Box 2407  
Rawlins, WY 82301

Re: Draft Visual Resource Management Plan  
Amendment Environmental Impact  
Statement, CEQ#20110232

Dear Ms. Murdock:

The U.S. Environmental Protection Agency Region 8 has reviewed the Draft Visual Resource Management (VRM) Plan Amendment and Environmental Impact Statement (EIS) prepared by the Bureau of Land Management. Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act (CAA), 42 U.S.C. Section 7609.

The BLM has prepared this Draft EIS to fulfill a need for a VRM Plan Amendment prompted by review of the proposed Chokecherry and Sierra Madre Wind Energy Project EIS in the Rawlins Field Office. A majority of the proposed project area is designated as VRM Class III, with a portion identified as VRM Class II. Wind energy development is typically not considered to be compatible with these VRM class designations in certain distance zones; therefore, the proposed wind energy project does not conform to the Rawlins Resource Management Plan for VRM. In this situation, the BLM's management options include the following choices: require modifications to the proposed project to be in compliance with the VRM plan amendment; consider an amendment of the Rawlins VRM decisions; or, deny the project application.

The Rawlins Field Office 2008 Resource Management Plan included a remand of its VRM portions due to a need for a current inventory of visual quality. The BLM has completed a visual resource inventory, but a Field Office-wide plan amendment has not occurred. The visual resource inventory has been used in this Draft EIS to develop alternatives for a targeted plan amendment in the area of the proposed wind energy project. VRM class designations will be considered in a future analysis for the remainder of the Rawlins Field Office. Alternatives considered in the Draft EIS and VRM Plan Amendment include the following:

- 1) Alternative 1, No Action – Continuation of existing management direction: 1% of the decision area would be designated as Class I, 17% as Class II, 77% as Class III and 5% as Class IV;
- 2) Alternative 2 – Emphasis on the development of resources: <1% of the decision area would be designated as Class I, <1% as Class II, 22% as Class III and 77% as Class IV;
- 3) Alternative 3 – Emphasis on protection of resources: 1% of the decision area would be designated as Class I, 43% as Class II, 46% as Class III, and 10% as Class IV;
- 4) Alternative 4, Preferred Alternative – Balance of opportunities, including energy and mineral development: 1% of the decision area would be designated as Class I, 10% as Class II, 31% as Class III, and 58% as Class IV.

The BLM will decide whether to amend the VRM decisions in the Chokecherry and Sierra Madre Project area as a prerequisite to approval of the wind energy project.

Based upon our review of the Draft EIS and VRM Plan Amendment, we are rating this document as “Lack of Objections” (LO). The “LO” rating indicates that our review has not identified any potential environmental impacts requiring substantive changes to the proposed plan amendment. Our comments on the Chokecherry and Sierra Madre Wind Energy Project Draft EIS are submitted under separate cover.

If you have any questions or would like to discuss our comments, please contact me at (303) 312-6925. You may also contact Molly Brodin, lead reviewer for this project, at (303) 312-6577 or by email at [brodin.molly@epa.gov](mailto:brodin.molly@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Bohan', with a long horizontal line extending to the right.

Suzanne J. Bohan

Director, NEPA Compliance and Review Program  
Office of Ecosystems Protection and Remediation

Enclosure



## U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements

### Definitions and Follow-Up Action\*

#### Environmental Impact of the Action

**LO - - Lack of Objections:** The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC - - Environmental Concerns:** The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO - - Environmental Objections:** The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU - - Environmentally Unsatisfactory:** The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

#### Adequacy of the Impact Statement

**Category 1 - - Adequate:** EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 - - Insufficient Information:** The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new, reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 - - Inadequate:** EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

